

Christopher Mixson, Esq. (NV Bar #10685)
KEMP JONES, LLP
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
Telephone: 702-385-6000
Facsimile: 702-385-6001
c.mixson@kempjones.com

Rafe Petersen (*pro hac vice*)
Alexandra E. Ward (*pro hac vice*)
HOLLAND & KNIGHT LLP
800 17th Street N.W., Suite 1100
Washington, DC 20006
Telephone: 202.419.2481
Facsimile: 202.955.5564
rafe.petersen@hklaw.com
alexandra.ward@hklaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

The BURNING MAN PROJECT, FRIENDS OF
BLACK ROCK/HIGH ROCK, INC., FRIENDS
OF NEVADA WILDERNESS, DAVID
JAMIESON, and ANDY MOORE, as individuals,

Plaintiffs,

v.

The UNITED STATES DEPARTMENT OF THE
INTERIOR, BUREAU OF LAND
MANAGEMENT, BLACK ROCK FIELD
OFFICE, MARK HALL, in his official capacity as
Field Manager of the Black Rock Field Office of
the Bureau of Land Management, and DEBRA
HAALAND in her official capacity as Secretary of
the Interior,

Defendants.

Case No.: 3:23-cv-00013-LRH-CSD

**STIPULATION AND PROPOSED
ORDER TO EXTEND DEADLINES IN
JUNE 5, 2023 ORDER APPROVING
JOINT CASE MANAGEMENT
REPORT AND BRIEFING PLAN**

(FIRST REQUEST)

Plaintiffs and Defendants hereby stipulate and request the Court approve an extension of the deadlines, as set forth below, for the Production of the Administrative Record and Briefing on the Merits set forth in Paragraph 8 B through E of the Parties' Joint Case Management Report and Briefing Plan ("JCMR"). This is the first motion to extend time under the JCMR.

To that end, Plaintiffs and Defendants request that the deadlines within Paragraph 8 of the

JCMR be revised as follows:

- B. Plaintiffs will notify Federal Defendants of any alleged deficiencies or other disputes regarding the sufficiency of the administrative record by no later than **October 27, 2023**.
- C. Federal Defendants will provide a response to Plaintiffs regarding any administrative record issues by **November 17, 2023**.
- D. If the parties are unable to resolve any issues related to the sufficiency of the administrative record, the following briefing schedule will apply:
 - i. Plaintiffs' Motion to Supplement or Complete the Administrative Record: due by **December 1, 2023**.
 - ii. Federal Defendants' Opposition: due by **December 15, 2023**.
 - iii. Plaintiffs' Reply: due by **January 5, 2023**.
- E. Plaintiffs shall file their motion for summary judgment and brief in support of their motion for summary judgment, the following schedule will apply:
 - i. Plaintiffs' Motion for Summary Judgment: due 60 days from the Court's ruling on Plaintiffs' Motion to Supplement or Complete the Administrative Record or, if no such motion is filed, by **December 15, 2023**.

DATED this 12th day of October, 2023.

Respectfully submitted,

KEMP JONES, LLP

/s/ Christopher W. Mixson
Christopher W. Mixson, Esq. (NV Bar #10685)
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169

Rafe Petersen (*pro hac vice*)
Alexandra E. Ward (*pro hac vice*)
HOLLAND & KNIGHT LLP
800 17th Street N.W., Suite 1100
Washington, DC 20006

Attorneys for Plaintiffs

/s/ Christopher C. Hair

Christopher C. Hair
Amanda K. Rudat
Trial Attorneys
United States Department of Justice
Environment & Natural Resources Division
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044-7611

Todd Kim
Assistant Attorney General
Environment and Natural Resources Division

Attorneys for Defendants

IT IS SO ORDERED.

DATED: _____

UNITED STATES MAGISTRATE JUDGE